

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ASTELLAS INSTITUTE FOR REGENERATIVE
MEDICINE,

Plaintiffs,

v.

IMSTEM BIOTECHNOLOGY, INC., XIAOFANG
WANG, and REN-HE XU,

Defendants.

C.A. No. 1:17-cv-12239

ASSENTED-TO MOTION FOR WITHDRAWAL OF APPEARANCE

Pursuant to Local Rule 83.5.2(c), the undersigned respectfully requests leave to withdraw the appearance of Timothy R. Shannon of the law firm of Verrill Dana, LLP for Defendants ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu (the “Defendants”) in this matter.

Mr. Shannon is leaving the employment of Verrill Dana, LLP. Defendants will continue to be represented by attorneys of record from Verrill Dana, LLP and Quinn Emanuel Urquhart & Sullivan, LLP. No party will be prejudiced if this motion is granted. Neither Defendants nor Plaintiff Astellas Institute for Regenerative Medicine oppose the relief sought in this motion.

WHEREFORE, the undersigned respectfully requests that this Court grant this motion and withdraw Timothy R. Shannon from representing Defendants in this matter.

Dated: November 4, 2021

VERRILL DANA LLP

/s/ Timothy Shannon

Timothy R. Shannon, MA Bar # 655325

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Xiaofang Wang, and Ren-He Xu*

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.1, I certify that on November 4, 2021 I conferred with counsel for the Plaintiff via email regarding the relief requested herein. Counsel for Plaintiff has indicated that they do not oppose the relief requested herein.

/s/ Timothy R. Shannon

Timothy R. Shannon

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2021, I caused a true copy of the foregoing document to be served upon all counsel of record via the Court's CM/ECF electronic filing system, as well as upon Defendants ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu via e-mail.

/s/ Timothy R. Shannon

Timothy R. Shannon